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July 9, 2015

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George Gowen, III, Esquire Cozen & O'Connor 1900 Market Street Philadelphia, PA 19103

RE: Constand v. Cosby (Consolidated)

Dear George:

I have checked my inbox and junk mail and I do not have your letter of June 30; however Bebe sent a copy to me and therefore we are addressing this letter to you, only,

It appears from this morning's Inquirer that you are aware of the identity of the author of the, as we call it, "the last straw" statement regarding Cosby's reason for settling. Consequently, we are requesting that you produce that individual and your client for deposition prior to the proceedings before Judge Rueter. If you are unwilling to do that, then we are requesting that they be available for questioning by the Court. In addition, will you produce all documentation surrounding the statement's release including all correspondence, notes, drafts and electronic transitions between and amongst, Cosby, his publicist(s), the individual responsible for releasing the statement and all media outlets including but not limited to ABC News.

You and your client are hereby put on notice not to destroy, conceal or alter any paper or electronic files and other data generated by and/or stored on any computer/hard drive, electronic storage media, cell phones, IPad's, voice mails or similar devices owned, used, leased or operated by any individual in the employ of, related to, or retained by defendant, regarding the release of information concerning the matters identified in the settlement agreement and specifically concerning the release of the statement concerning Cosby's reason for settling the above captioned matter.

If you wish to discuss this matter further, please do not hesitate to call.

Very truly yours,

Dolores M. Trojani

Very truly yours,

Bebe H. Kivitz

Jacobs Kivitz & Drake LLC 1525 Locust Street, 12th Floor

Philadelphia, PA 19102

VIA ELECTRONIC AND REGULAR MAIL